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**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

THOMAS HILLERY, an individual, and as
Guardian Ad Litem for MARY JANE
HILLERY, an adult.

CASE NO.: 2:17-cv-02639-MMD-EJY

STIPULATION AND ORDER TO DISMISS PURSUANT TO SETTLEMENT

Plaintiffs,

VS.

SUN CITY ANTHEM COMMUNITY
ASSOCIATION, INC.; DOE INDIVIDUALS
1 through 100; ROE BUSINESS
ENTITIES 1 through 25, inclusive

Defendants.

COME NOW, Plaintiffs, THOMAS HILLERY, an individual, and as Guardian Ad Litem for MARY JANE HILLERY, an adult, and Defendant, SUN CITY ANTHEM COMMUNITY ASSOCIATION, (collectively, the "Parties"), by and through their undersigned attorneys hereby stipulate and agree as follows:

WHFRFAS:

1. On October, 12, 2017, Plaintiffs filed a Complaint for discrimination and other claims against Defendant:

1 2. On December 16, 2018, Plaintiffs filed their Second Amended Complaint
2 against Defendant;

3 3. On December 27, 2018, Defendants Answered the Second Amended
4 Complaint denying discrimination and all other claims therein;

5 4. On October 28, 2019, an Order setting settlement conference was entered
6 [ECF No. 77];

7 5. On December 19, 2019, the Parties participated in a settlement conference
8 that was continued to December 23, 2019 [ECF No. 85];

9 6. On December 23, 2019, the settlement conference concluded with the Parties
10 reaching a confidential global settlement of all claims [ECF No. 86], and the Parties have
11 since executed a confidential settlement agreement; and

12 7. Each Party shall bear its own fees and costs incurred in this litigation and
13 settlement.

14 **NOW THEREFORE, IT IS HEREBY STIPULATED AND AGREED** that Plaintiff's
15 Second Amended Complaint against Defendant is hereby dismissed in its entirety ***with***
16 ***prejudice.***

17 **IT IS FURTHER STIPULATED AND AGREED** that nothing in this Stipulation and
18 Order is intended to be, or will be, construed as an admission of the claims or defenses of
19 the Parties.

1 **IT IS FURTHER STIPULATED AND AGREED** that each Party shall bear its own
2 attorney's fees and costs incurred in this litigation and settlement.

3 **IT IS SO STIPULATED.**

5 Dated this 17TH day of March 2020.

6 N.R. DONATH & ASSOCIATES PLLC

7 By: /s/ Nicolas R. Donath
8 NICOLAS R. DONATH
9 Nevada Bar No. 13106
9 871 Coronado Center Dr., Suite 200
9 Henderson, Nevada 89052

10 *Attorney for Plaintiffs*

5 Dated this 17TH day of March 2020.

6 LIPSON NEILSON P.C.

7 By: /s/ David T. Ochoa
8 DAVID T. OCHOA
9 Nevada Bar No. 10414
9 9900 Covington Cross Drive, Suite 120
9 Las Vegas, Nevada 89144

10 *Attorney for Defendant*

11 **IT IS SO ORDERED.**

12 By: 

13 _____
14 Judge, U.S. District Court

15 Dated this 17th day of March, 2020.

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CERTIFICATE OF SERVICE

3 I hereby certify that on the 17TH day of March, 2020, service of the foregoing
4 **STIPULATION AND ORDER TO DISMISS PURSUANT TO SETTLEMENT** was made by
5 electronic submission and filing of the foregoing with the Clerk of the Court by using the
6 ECF system which served the following parties electronically:

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16 *Attorneys for Plaintiff*

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s/ David Ochoa
Employee of
LIPSON NEILSON, P.C.